

# United States District Court

## EASTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,

*Plaintiff,*

v.

BROOKLYN ELAINE WILSON,

*Defendant.*

### CRIMINAL COMPLAINT

Case No. 24-MJ-126-JAR

I, Dustin L. Carder, the undersigned complainant, state that the following is true to the best of my knowledge and belief.

On or about March 1, 2024, through April 14, 2024, in the Eastern District of Oklahoma, Brooklyn Elaine Wilson, committed the crime of **Aggravated Sexual Abuse of a Minor in Indian Country, Sexual Exploitation of a Child by a Parent, Distribution of Child Pornography, and Possession of Child Pornography**, in violation of Title 18, United States Code, Section(s) 2241(c), 2246(2)(C), 1152; 2251(b) & (e); 2252(a)(2) and (b)(1); and 2252(a)(4)(B) and (b)(2).

I further state that I am a Special Agent with Homeland Security Investigations, and that this complaint is based on the following facts:

(See attached Affidavit of Dustin L. Carder, which is attached hereto and made a part hereof by reference.)

Continued on the attached sheet.

Dustin L. Carder  
Special Agent  
Homeland Security Investigations

Sworn to on 4/14/2024.



JASON A. ROBERTSON  
UNITED STATES MAGISTRATE JUDGE  
Name and Title of Judicial Officer

Signature of Judicial Officer

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF OKLAHOMA**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Dustin Carder, a Special Agent (“SA”) with Homeland Security Investigations, being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I have been employed as a Special Agent (“SA”) with Immigration and Customs Enforcement (“ICE”), Homeland Security Investigations (“HSI”) since December 2018 and am currently assigned to the Office of the Resident Agent in Charge in Tulsa, Oklahoma, and am currently assigned to investigate crimes involving child exploitation. While employed by HSI, I have investigated federal criminal violations related to child exploitation and child pornography. I have gained experience through training at the Federal Law Enforcement Training Center’s (FLETC) twelve-week Criminal Investigator Training Program (CITP) and the sixteen-week Homeland Security Investigations Special Agent Training (HSISAT) program, and everyday work relating to conducting these types of investigations. I have received training in the area of child pornography and child exploitation and have had the opportunity to observe and review numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. I have received focused child exploitation training covering topics such as: interview techniques, live streaming investigations, undercover investigations, capturing digital evidence, transnational child sex offenders, and mobile messaging platforms utilized by these types of offenders. I am an investigative officer, or law enforcement officer, of the United States of America within the meaning of 18 U.S.C. § 2510(7) and Rule 41(a)(2)(C) of the Federal Rules

of Criminal Procedure, that is an officer of the United States who is empowered by law to request search warrants and to conduct investigation of, and make arrests for, offenses enumerated in Title 18. Moreover, I am a federal law enforcement officer who is engaged in enforcing the criminal laws, including 18 U.S.C. §§ 2422, 2241, 2251, 2252, and 2252(a).

2. As part of my duties as a Special Agent, I investigate criminal violations, including violations of Title 18 U.S.C. §§ 2241(c), 2246(2)(C), 1152 (Aggravated Sexual Abuse of a Minor in Indian Country), Title 18 U.S.C. § 2251(b) & (e) (Sexual Exploitation of a Child by a Parent), Title 18 U.S.C. § 2252(a)(2) and (b)(1) (Receipt/Distribution of Child Pornography), and Title 18 U.S.C. § 2252(a)(4)(B) and (b)(2) (Possession of Child Pornography).

3. I am familiar with the facts and circumstances of this investigation. The facts set forth in this affidavit are based on my personal observations, knowledge obtained from other law enforcement officers, my review of documents related to this investigation, conversations with others who have personal knowledge of the events and circumstances described herein, and a review of open-source information including information available on the Internet. Because this affidavit is submitted for the limited purpose of establishing probable cause in support of the application for an arrest warrant, it does not set forth each and every fact I or others have learned during the course of this investigation.

#### **PROBABLE CAUSE**

4. As will be shown below, there is probable cause to believe that Brooklyn Elaine WILSON committed violations of Title 18 U.S.C. §§ 2241(c), 2246(2)(C), 1152 (Aggravated Sexual Abuse of a Minor in Indian Country), Title 18 U.S.C. § 2251(b) & (e) (Sexual

Exploitation of a Child by a Parent), Title 18 U.S.C. § 2252(a)(2) and (b)(1) (Receipt/Distribution of Child Pornography), and Title 18 U.S.C. § 2252(a)(4)(B) and (b)(2) (Possession of Child Pornography).

5. On April 13, 2024, Michael Oliver, an Investigator with the District 16 District Attorney's Office, Poteau, LeFlore County, Oklahoma, in the Eastern District of Oklahoma, was called to assist in a case by LeFlore County Sheriff's Office ("LCSO").

6. During the course of his investigation, he interviewed an individual by the name of Alicia Simons ("Simons"). Simons stated that Armando PALMA ("PALMA") sent her videos and pictures using Snapchat<sup>1</sup>.

7. Simons stated her Snapchat account has the username aliciasimons222 and PALMA's Snapchat account has the username apalma9133. Simons stated that PALMA's phone number is (918) 658-4260.

8. Simons was previously romantically involved with PALMA. During the course of that relationship, PALMA informed Simons that he has a five-year-old daughter.

9. Simons was home from college while on spring break. While home, Simons received a series of photos and videos from PALMA. Simons stated most of the files appeared to be taken in a hotel room and that one of them appeared to have someone else filming the video.

10. Within one of these videos PALMA can be seen using his penis to penetrate the vagina of a young girl, PALMA can be seen having the child use her hand to stroke his penis while

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<sup>1</sup> Snapchat is an American multimedia instant messaging app and service developed by Snap Inc., originally Snapchat Inc. One of the principal features of Snapchat is that pictures and messages are usually only available for a short time before they become inaccessible to their recipients.

she is on an iPad, and PALMA can be seen placing his mouth on the child's vagina. Simons stated that PALMA referred to the young girl as his daughter within these videos.

11. While interviewing Simons, Investigator Oliver located PALMA's publicly available information and located an image of a little girl. Simons confirmed that the little girl on PALMA's Facebook page was the same girl present in the images sent to her by PALMA on Snapchat.

12. Investigator Oliver confirmed that the child appeared to be approximately five-years of age.

13. Open records searches show that that PALMA renewed his driver's license in January of 2024 to an address at 21814 Cedar Hill Drive Howe, LeFlore County, Oklahoma 74940. From this information, Investigator Oliver was able to find tax records for the residence and learned that Vicki WILSON owns the property.

14. During surveillance of the house, Investigator Oliver saw that the residence had a vehicle parked outside with a Choctaw Nation tribal license attached to it. Investigator Oliver discovered that PALMA has a Certificate of Degree of Indian Blood through the Bureau of Indian Affairs, and is a member of the Choctaw Nation. Investigator Oliver sought the assistance of HSI Tulsa to further the investigation.

15. Through research of law enforcement and State of Oklahoma databases, an HSI analyst located two vehicles registered to PALMA at 21814 Cedar Hill Drive, Howe, Oklahoma: a 2019 Kia Forte with Choctaw Nation tag 09358CH, and a 2018 Ford Mustang with Choctaw Nation tag CH98302. During surveillance on April 14, 2024, both of these vehicles were observed at 21814 Cedar Hill Drive, Howe, Oklahoma.

16. On April 14, 2024, I obtained a search warrant for the residence at 21814 Cedar Hill Drive, Howe, Oklahoma, within the Eastern District of Oklahoma (MJ-24-121-JAR). The warrant was authorized by the Honorable Jason A. Robertson, U.S. Magistrate Judge, and authorizing, amongst other things, the search of “[a]ny cellular telephone, smartphone, tablet, personal digital assistant, computer, computer system and related peripherals” located within this home.

17. Pursuant to this warrant Special Agents with HSI arrived at the Residence on April 14, 2024, in order conduct a search. While at the Residence they located a minor female, and her biological mother, Brooklyn Elaine WILSON (“WILSON”). Special agents located an iPhone 14 Pro Max, with IMEI # 35 342781 454313 6, on WILSON’s person. This device was seized pursuant to the search warrant.

18. An initial review of the contents of this device was performed at the Residence. This search revealed that WILSON had the application Snapchat downloaded on her phone. This account has the username “brooklynwil25.”

19. Conversations between WILSON and PALMA’s account, “apalma9133,” are present on the device. The saved communications between WILSON and PALMA show a video of a female hand spreading the labia majora of a minor female and video of an adult male penis being rubbed against a minor female’s vagina. In one video an adult male can be seen performing oral sex on a female child, who appears to be five-years old. The adult male’s face is clearly visible within this video.

20. The child within these videos has been positively identified as the biological child of WILSON and PALMA, Minor Victim (D.O.B. 00/00/2018). Palma has confirmed that Minor Victim is a registered member of the Choctaw Nation, a federally recognized tribe.

21. Based on our ongoing investigation, the Agents reviewing the video have identified the adult male as PALMA.

22. Bedding, pillows, and blankets can be seen in the videos of Minor Victim being sexually abused. Items consistent with those depicted within the videos were observed to be in the Residence during a search for electronic evidence on April 14, 2024.

23. In one video WILSON can be seen slapping Minor Victim on the buttocks with a dildo that is murky and has pink and purple polka dots. A dildo matching that in the video was observed by agents at the residence.

24. Minor Victim was wearing underwear in some of these videos. Underwear matching those in the videos was observed by agents at the Residence.

25. WILSON is wearing undergarments and a lingerie in some of these videos. Underwear matching those in the videos was observed by agents at the Residence.

26. Minor Victim can be seen clinging to stuffed animals in videos while she is being sexually abused. Stuffed animals matching those in the videos were observed at the Residence.

### **CONCLUSION**

27. Based on the information set forth in this affidavit, I submit there is probable cause to believe that Brooklyn Elaine WILSON, DOB: XX/XX/1997, has violated Title 18 U.S.C. §§ 2241(c), 2246(2)(C), 1152 (Aggravated Sexual Abuse of a Minor in Indian Country), Title 18 U.S.C. § 2251(b) & (e) (Sexual Exploitation of a Child by a Parent), Title 18

U.S.C. § 2252(a)(2) and (b)(1) (Receipt/Distribution of Child Pornography), and Title 18

U.S.C. § 2252(a)(4)(B) and (b)(2) (Possession of Child Pornography).

Respectfully Submitted,



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Dustin Carder  
Special Agent  
Homeland Security Investigations

Sworn and to before me this 14th day of April 2024.



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UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF OKLAHOMA